

SERFF Tracking Number:	WEST-125668300	State:	Arkansas
Filing Company:	ING USA Annuity and Life Insurance Company	State Tracking Number:	39377
Company Tracking Number:	IU-RA-3082		
TOI:	A07I Individual Annuities - Special	Sub-TOI:	A07I.001 Equity Indexed
Product Name:	IU-RA-3082		
Project Name/Number:	Cash Surrender Value Endorsement/IU-RA-3082		

Filing at a Glance

Company: ING USA Annuity and Life Insurance Company

Product Name: IU-RA-3082

SERFF Tr Num: WEST-125668300 State: ArkansasLH

TOI: A07I Individual Annuities - Special

SERFF Status: Closed

State Tr Num: 39377

Sub-TOI: A07I.001 Equity Indexed

Co Tr Num: IU-RA-3082

State Status: Approved-Closed

Filing Type: Form

Co Status:

Reviewer(s): Linda Bird

Authors: Karen Flieck, Alicia

Disposition Date: 06/24/2008

Gemelli, Susan Holloway, Carolyn

Mulhall, Christine Runkle-DiFonzo

Date Submitted: 06/23/2008

Disposition Status: Approved

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: Cash Surrender Value Endorsement

Status of Filing in Domicile: Pending

Project Number: IU-RA-3082

Date Approved in Domicile:

Requested Filing Mode: Review & Approval

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Group Market Size:

Overall Rate Impact:

Group Market Type:

Filing Status Changed: 06/24/2008

State Status Changed: 06/24/2008

Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

RE: ING USA Annuity and Life Insurance Company

NAIC #: 229-80942 FEIN: 41-0991508

IU-RA-3082 Cash Surrender Value Endorsement

IU-RA-3083 Cash Surrender Value Endorsement

IU-RA-3084 Cash Surrender Value Endorsement

IU-RA-3085 Cash Surrender Value Endorsement

<i>SERFF Tracking Number:</i>	<i>WEST-125668300</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING USA Annuity and Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>39377</i>
<i>Company Tracking Number:</i>	<i>IU-RA-3082</i>		
<i>TOI:</i>	<i>A071 Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A071.001 Equity Indexed</i>
<i>Product Name:</i>	<i>IU-RA-3082</i>		
<i>Project Name/Number:</i>	<i>Cash Surrender Value Endorsement/IU-RA-3082</i>		

Enclosed please find the above referenced forms submitted for your review and approval. The forms are new and are not intended to revise or replace any form previously filed with or approved for use by your Department.

Please note: While this submission may only show one line of insurance in SERFF (TOI and Sub-TOI), it will be used with our single and flexible premium deferred annuity contracts mentioned below.

The enclosed forms are endorsements intended to be used with the following fixed annuity contracts previously approved for use in your state.

Endorsement	Form Number and Contract Title	Approval Date
IU-RA-3082	IU-IA-3033(AR) Flexible Premium Deferred Annuity Contract	5/2/06
	IU-IA-3034(AR) Flexible Premium Deferred Annuity Contract	4/17/06
IU-RA-3083	IU-IA-3026(AR) Single Premium Deferred Annuity Contract	2/22/06
IU-RA-3084	IU-IA-3050(AR) Single Premium Deferred Annuity Contract	2/6/07
IU-RA-3085	IU-IA-3036 Single Premium Deferred Annuity Contract	5/26/06

The endorsements are intended to amend the "Cash Surrender Value" provision stated in the contracts. Please note that each endorsement has its own unique language to correspond with the annuity contract as stated above. The endorsements represent a liberalization of contract terms. They apply any applicable charges only to partial surrenders in excess of the base contract's free withdrawal amount (i.e. either interest only or 10% of the contract's accumulation value), unless the contract is surrendered for its full cash surrender value as described in the endorsements. The endorsements will be attached to all new issues only at no cost to the prospective purchaser.

Enclosed in brackets is the officer's signature. We reserve the right to make changes to the officer's signature to reflect current company operations. In addition, changes in printing technology may periodically alter slightly form format. We reserve the right to make such changes without refilling. Any such change, when made, will comply with state laws and contract guarantees.

SERFF Tracking Number: WEST-125668300 State: Arkansas
Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 39377
Company Tracking Number: IU-RA-3082
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: IU-RA-3082
Project Name/Number: Cash Surrender Value Endorsement/IU-RA-3082

Company and Contact

Filing Contact Information

Christine DiFonzo, Contract Analyst christine.runkle-difonzo@us.ing.com
1475 Dunwoody Drive (800) 325-3797 [Phone]
West Chester, PA 19380 (610) 425-3520[FAX]

Filing Company Information

ING USA Annuity and Life Insurance Company CoCode: 80942 State of Domicile: Iowa
1475 Dunwoody Drive Group Code: 229 Company Type:
West Chester, PA 19380 Group Name: State ID Number:
(800) 325-3792 ext. [Phone] FEIN Number: 41-0991508

Filing Fees

Fee Required? Yes
Fee Amount: \$80.00
Retaliatory? No
Fee Explanation: 4 forms @ \$20.00
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING USA Annuity and Life Insurance Company	\$80.00	06/23/2008	21038298

SERFF Tracking Number:	WEST-125668300	State:	Arkansas
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TOI:	A071 Individual Annuities - Special	Sub-TOI:	A071.001 Equity Indexed
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	06/24/2008	06/24/2008

SERFF Tracking Number: *WEST-125668300* *State:* *Arkansas*
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TOI: *A071 Individual Annuities - Special* *Sub-TOI:* *A071.001 Equity Indexed*
Product Name: *IU-RA-3082*
Project Name/Number: *Cash Surrender Value Endorsement/IU-RA-3082*

Disposition

Disposition Date: 06/24/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: WEST-125668300 State: Arkansas

Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 39377

Company Tracking Number: IU-RA-3082

TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed

Product Name: IU-RA-3082

Project Name/Number: Cash Surrender Value Endorsement/IU-RA-3082

Item Type	Item Name	Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Form	Cash Surrender Value Endorsement		Yes
Form	Cash Surrender Value Endorsement		Yes
Form	Cash Surrender Value Endorsement		Yes
Form	Cash Surrender Value Endorsement		Yes

SERFF Tracking Number: WEST-125668300 State: Arkansas

Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 39377

Company Tracking Number: IU-RA-3082

TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed

Product Name: IU-RA-3082

Project Name/Number: Cash Surrender Value Endorsement/IU-RA-3082

Form Schedule

Lead Form Number: IU-RA-3082

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	IU-RA-3082	Policy/Cont	Cash Surrender ract/Fratern Value Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		70	IU-RA-3082.pdf
	IU-RA-3083	Policy/Cont	Cash Surrender ract/Fratern Value Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		68	IU-RA-3083.pdf
	IU-RA-3084	Policy/Cont	Cash Surrender ract/Fratern Value Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		69	IU-RA-3084.pdf
	IU-RA-3085	Policy/Cont	Cash Surrender ract/Fratern Value Endorsement al Certificate: Amendmen	Initial		69	IU-RA-3085.pdf

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Product Name:	IU-RA-3082		
Project Name/Number:	Cash Surrender Value Endorsement/IU-RA-3082		
	t, Insert		
	Page,		
	Endorseme		
	nt or Rider		

**ING USA
ANNUITY AND LIFE
INSURANCE COMPANY**

ING USA is a stock company domiciled in Iowa
(HEREINAFTER CALLED WE, US AND OUR)

**Cash Surrender Value
Endorsement**

The Contract to which this Cash Surrender Value Endorsement (this "Endorsement") is attached is hereby modified by the provisions of this Endorsement. The Endorsement's provisions shall control when there is a conflict between this Endorsement and the Contract. Any capitalized terms not defined in this Endorsement shall have the meaning given to them in the Contract. This Endorsement is effective as of the Contract Date.

The "Cash Surrender Value" provision is deleted in its entirety and replaced with the following:

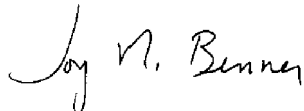
Cash Surrender Value – The Cash Surrender Value of this Contract equals the greater of:

- (a) The Minimum Guaranteed Contract Value; or
- (b) The Accumulation Value, less any applicable Surrender Charge.

During the first Contract Year, partial Surrenders of interest credited to the Fixed Rate Strategy are not subject to a Surrender Charge. In any Contract Year after the first, if partial Surrenders do not exceed 10% of the Contract's Accumulation Value, as determined on the date of the first partial Surrender during that Contract Year, the amount Surrendered is not subject to a Surrender Charge. If partial Surrenders in any Contract Year exceed these amounts ("Excess Partial Withdrawals"), applicable Surrender Charges will apply to the total amount of the Excess Partial Withdrawals. In the event of a full Surrender, applicable Surrender Charges will apply to the total amount Surrendered during that Contract Year, including prior partial Surrenders not defined as Excess Partial Withdrawals.

All other terms and provisions of the Contract remain unchanged.

Signed:



Secretary

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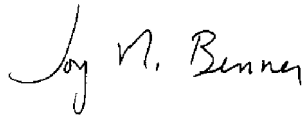
Cash Surrender Value – The Cash Surrender Value of this Contract equals the greater of:

- (a) The Minimum Guaranteed Contract Value; or
- (b) The Accumulation Value, adjusted for any Market Value Adjustment applicable, less any applicable Surrender Charge.

During the first Contract Year, partial Surrenders of interest credited to the Fixed Rate Strategy are not subject to a Surrender Charge or Market Value Adjustment. In any Contract Year after the first, if partial Surrenders do not exceed 10% of the Contract's Accumulation Value, as determined on the date of the first partial Surrender during that Contract Year, the amount Surrendered is not subject to a Surrender Charge or Market Value Adjustment. If partial Surrenders in any Contract Year exceed these amounts ("Excess Partial Withdrawals"), applicable Surrender Charges and Market Value Adjustments will apply to the total amount of the Excess Partial Withdrawals. In the event of a full Surrender, applicable Surrender Charges and Market Value Adjustments will apply to the total amount Surrendered during that Contract Year, including prior partial Surrenders not defined as Excess Partial Withdrawals.

All other terms and provisions of the Contract remain unchanged.

Signed:



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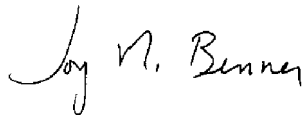
Cash Surrender Value – The Cash Surrender Value of this Contract equals the greater of:

- (a) The Minimum Guaranteed Contract Value; or
- (b) The Accumulation Value, adjusted for any Market Value Adjustment applicable, less any applicable Surrender Charge and Bonus Recapture.

During the first Contract Year, partial Surrenders of interest credited to the Fixed Rate Strategy are not subject to a Surrender Charge, Bonus Recapture or Market Value Adjustment. In any Contract Year after the first, if partial Surrenders do not exceed 10% of the Contract's Accumulation Value, as determined on the date of the first partial Surrender during that Contract Year, the amount Surrendered is not subject to a Surrender Charge, Bonus Recapture or Market Value Adjustment. If partial Surrenders in any Contract Year exceed these amounts ("Excess Partial Withdrawals"), applicable Surrender Charges, Bonus Recaptures and Market Value Adjustments will apply to the total amount of the Excess Partial Withdrawals. In the event of a full Surrender, applicable Surrender Charges, Bonus Recaptures and Market Value Adjustments will apply to the total amount Surrendered during that Contract Year, including prior partial Surrenders not defined as Excess Partial Withdrawals.

All other terms and provisions of the Contract remain unchanged.

Signed:



Secretary

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The "Cash Surrender Value" provision is deleted in its entirety and replaced with the following:

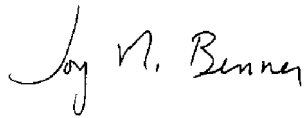
Cash Surrender Value – The Cash Surrender Value of this Contract equals the greater of:

- (a) The Minimum Guaranteed Contract Value; or
- (b) The Accumulation Value, adjusted for any Market Value Adjustment applicable, less any applicable Surrender Charge.

During the first Contract Year, partial Surrenders of interest credited to the Accumulation Value are not subject to a Surrender Charge or Market Value Adjustment. In any Contract Year after the first, if partial Surrenders do not exceed 10% of the Contract's Accumulation Value, as determined on the date of the first partial Surrender during that Contract Year, the amount Surrendered is not subject to a Surrender Charge or Market Value Adjustment. If partial Surrenders in any Contract Year exceed these amounts ("Excess Partial Withdrawals"), applicable Surrender Charges and Market Value Adjustments will apply to the total amount of the Excess Partial Withdrawals. In the event of a full Surrender, applicable Surrender Charges and Market Value Adjustments will apply to the total amount Surrendered during that Contract Year, including prior partial Surrenders not defined as Excess Partial Withdrawals, except as outlined in Sections 5.3 and 5.5.

All other terms and provisions of the Contract remain unchanged.

Signed:



Secretary

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Rate Information

Rate data does NOT apply to filing.

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Supporting Document Schedules

Review Status:

Satisfied -Name: Certification/Notice

05/28/2008

Comments:

See attached.

Attachments:

AR Rule 19 Certification.pdf

ARStanreadcert.pdf

**ARKANSAS
POLICY FORM CERTIFICATION**

Form: IU-RA-3082; IU-RA-3083; IU-RA-3084; IU-RA-3085

I have reviewed the enclosed policy form and certify that the form submitted meets the provisions of Rule 19 as well as all applicable requirements of the Arkansas Insurance Department.

Signed:

A handwritten signature in cursive script that reads "Alice W. Su".

Alice W. Su, FSA, MAAA
Vice President

Readability Certificate

I hereby certify that the forms referenced below have each been scored in their entirety using the Flesch Ease of Reading Test and have attained the score indicated. I further certify that, to the best of my knowledge and belief, said forms comply with state readability requirements and are printed in not less than ten point type, one point leaded.

The readability score was calculated by computer. The software used for this calculation was Microsoft Word.

<u>Form Number</u>	<u>Form Title</u>	<u>Flesch Score</u>	<u>Sentences</u>	<u>Words</u>
IU-RA-3082	Cash Surrender Value Endorsement	70.4	14	165
IU-RA-3083	Cash Surrender Value Endorsement	68.1	14	179
IU-RA-3084	Cash Surrender Value Endorsement	68.7	14	183
IU-RA-3085	Cash Surrender Value Endorsement	68.9	14	184

ING USA Annuity and Life Insurance Company



Alice W. Su, FSA, MAAA
Vice President